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11 Attorneys for Plaintiff

DIGITAL REG OF TEXAS, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

17 DIGITAL REG OF TEXAS, LLC,

18 Plaintiff,

19 v.

20 ADOBE SYSTEMS INCORPORATED, et al.,

21 Defendants.

No. 12-CV-01971 CW (KAW)

**DECLARATION OF W. PAUL
SCHUCK IN SUPPORT OF
DEFENDANT ADOBE'S MOTION
TO SEAL CONFIDENTIAL
INFORMATION (DKT. 627)**

1 I, W. Paul Schuck, hereby declare:

2 1. I am an attorney licensed to practice law in the State of California, and I am
3 admitted to practice before the Northern District of California. I am a principal at the law firm
4 Bartko, Zankel, Bunzel & Miller, counsel for plaintiff Digital Reg of Texas, LLC ("Digital Reg")
5 in this case. The facts stated herein are true of my own knowledge, unless otherwise stated, and if
6 called to testify I could and would testify to those facts.

7 2. I submit this declaration pursuant to Civil Local Rule 79-5(e) in support of
8 Defendant Adobe Systems Incorporated's ("Adobe") Motion for Administrative Relief Under L.R.
9 7-11 and 79-5 to Seal Confidential Information, filed on August 18, 2014 (Dkt. No. 627).

10 Specifically, Digital Reg joins Adobe's request that the Second Supplemental Expert Damages
11 Report of Russell L. Parr ("Supplemental Report") be filed under seal. Digital Reg further
12 requests that the portions of Adobe's Update to Motion *In Limine* No. 1 that quote or describe the
13 information in Supplemental Report remain redacted in the public docket and that the unredacted
14 brief be kept under seal.

15 3. The Supplemental Report includes confidential commercial and financial
16 information that Adobe has designated as confidential. Public disclosure of the information could
17 cause harm to Adobe.

18 4. In addition, the Supplemental Report includes discussion and analysis of Digital
19 Reg's patent licenses. Digital Reg believes that disclosure of this information would place it at a
20 commercial disadvantage in future licensing negotiations and could affect future business plans
21 adversely. Therefore, Digital Reg routinely maintains the confidentiality of this information.

22 5. The license information in the Supplemental Report also constitutes confidential
23 information of the third parties that have taken a license from Digital Reg. Disclosure of the
24 information could cause competitive harm to Digital Reg's third party business partners. For these
25 reasons, Digital Reg has designated this information as confidential under the protective order and
26 requests that the Supplemental Report be filed under seal.

6. In addition, Digital Reg requests that the portions of Adobe's Update to Motion *In Limine* No. 1 (Docket No. 628) that quote or describe the Supplemental Report also be kept under seal.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 19, 2014, at San Francisco, California.

/s/ W. Paul Schuck
W. Paul Schuck

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